



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

June 9, 2022

BY ECF

Hon. Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *ACLU et al. v. Customs and Border Protection et al.*, 21 Civ. 10430 (ER)

Dear Judge Ramos:

This Office represents the defendant agencies in the above-referenced action brought under the Freedom of Information Act. Pursuant to the Court's order at the initial conference, I write respectfully to provide the Court with a further status report regarding the agencies' searches and productions in this case. The agencies remain on track with the search and processing schedules reported in the prior letter, except that the U.S. Marshals Service, which had anticipated making its first production by the end of May, has not yet completed review of the relevant documents, and now anticipates making this production by the end of June. In addition, Immigration and Customs Enforcement ("ICE") made its initial production in this case today, which included a notification that ICE needed to consult with other agencies about some of the documents, and had referred certain other documents to U.S Customs and Border Protection.

The parties will make their next monthly status report on July 11, 2022. We thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: s/Jean-David Barnea
JEAN-DAVID BARNEA
LUCAS ISSACHAROFF
Assistant United States Attorneys
Telephone: (212) 637-2679/2737
Email: Jean-David.Barnea@usdoj.gov
Lucas.Issacharoff@usdoj.gov

cc: Counsel for plaintiffs (by ECF)